

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

Case No. 10-CR-117

MICHAEL BOND,

Defendant.

MOTION FOR PRE-TRIAL RELEASE

Pursuant to 18 U.S.C. s. 3142, the defendant, Michael Bond, hereby moves the court for pre-trial release.

The Defendant is charged with conspiracy to deliver in excess of 1,000 kilograms of marijuana. The allegations are that the defendant obtained marijuana from a source in Mexico which he distributed in Milwaukee. The co-conspirators are all sisters, girlfriends, nephews or shirt-tail relatives of the defendant.

There is nothing particularly aggravating about the allegations. It is the position of the defense that even if the conspiracy is true, it is questionable whether the amount of the relevant conduct exceeds 1,000 kilograms. There is no violence associated with the alleged conspiracy. There are no firearms charges against the defendant.

The Defendant is fifty years old and a life-long resident of Milwaukee. All of his family ties are to the city, including his children and the mothers of his children who all live in Milwaukee. If released, he will be residing with a friend of his who lives alone in a house on N. 27th St. in Milwaukee. He also believes he will be able to return to work as a saw blade salesman at H & S Cutting on N. 38th St. in Milwaukee.

The Defendant has no AODA issues and was negative for controlled substances when he was arrested in June.

The Defendant, who has been in custody since early June, 1010, can post \$5,000.

The Defendant is requesting that he be released on the following conditions:

- 1) Maintain stable residence. Upon release, the Defendant can reside with Shirley Jackson on N. 27th St. in Milwaukee,
- 2) Job search and maintain employment;
- 3) Mandatory urinalysis;
- 4) Mandatory cooperation with the United States Probation Office; and
- 5) Electronic Monitoring and Home Detention, with release for job search and/or employment, enrollment and participation in school, or to visit his attorney.
- 6) No contact with the co-defendants in this case.

While recognizing that the rebuttable presumption applies, the Defendant asks the court to consider that proposed conditions will reasonably assure his appearance and that there is a minimal risk to the safety of others.

For the reasons stated above, and upon further argument which may be provided in court, the Defendant asks that the court order him to be released from custody upon the posting of an amount of \$5,000 with whatever non-cash conditions the court believes are fit and proper to impose.

Dated this 5th day of November, 2010.

Respectfully submitted,

/s/
Thomas J. Erickson
Attorney for Defendant

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